

The Honorable Jamal N. Whitehead

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

DEJAVUAI, INC., a Washington corporation,

Plaintiff,

V.

FYODOR "TED" KAPUSTIN aka FYDOR "TED" KAPUSTINE, an individual,

Defendant.

No. 2:25-cv-00915

[PROPOSED] ORDER GRANTING
PLAINTIFF'S EMERGENCY MOTION
FOR ORDER TO SHOW CAUSE RE
CONTEMPT AND/OR OTHER
SANCTIONS

Having considered Plaintiff DejaVuAI Inc.’s Emergency Motion for Order to Show Cause re Contempt and/or Other Sanctions, all papers filed in support of and in opposition to the Motion, and the argument (if applicable) of the Parties,

The Court finds clear and convincing evidence that Defendant Fyodor “Ted” Kapustin (“Defendant” or “Kapustin”) failed to comply with the Court’s May 22, 2025, Temporary Restraining Order that immediately enjoined him from:

- Contacting any of DejaVuAI's current and prospective customers, resellers, licensors, vendors, or other business contacts whom he is aware of by virtue of his former DejaVuAI employment or his position as a director of the Company;
 - Engaging in any form of conduct or making statements or representations that disparage, portray in a negative light, or otherwise impair the reputation or commercial interest of DejaVuAI, its officers and directors, its investors, or its products and services;

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- selling, offering for sale, marketing, or otherwise conducting or purporting to conduct business with respect to any product or service in competition with DejaVuAI's products or services; and
 - taking any action to directly or indirectly interfere with DejaVuAI's operations, including any conduct to disrupt, alter, or otherwise affect any digital services or infrastructure that DejaVuAI currently uses to operate or market its business.

The Court further finds that Defendant acted in bad faith to disrupt this litigation by attempting to threaten, harass, and intimidate Plaintiff DejaVuAI, Inc. into dropping its lawsuit.

Therefore, good cause appearing, **IT IS HEREBY ORDERED** as follows:

ORDER TO SHOW CAUSE

Defendant Fyodor “Ted” Kapustin (“Defendant” or “Kapustin”) is ordered to show cause, if any, not later than _____ days from the date of this order, as to why he should not be held in civil contempt or otherwise sanctioned.

Dated this ____ day of June, 2025.

Hon. Jamal N. Whitehead
United States District Judge

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